



July 31, 2025

Via ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Andre Llacuna*, 22-mj-2478

Dear Judge Netburn,

This letter concerns my representation of Mr. Andre Llacuna in the above-captioned case. I write the Court to request a temporary amendment to Mr. Llacuna's bail conditions to allow for career-related travel.


I respectfully request permission for Mr. Llacuna to travel to Las Vegas to attend a haircutting class from a professional hairstylist from Canada from August 15, 2025, to August 18, 2025. He would depart from Ontario International Airport in California the afternoon of August 15, returning from Las Vegas the night of Monday, August 18, 2025. During his trip, he plans to stay at two separate hotels with a few of the other barbers, at locations that have been provided to both U.S. Pretrial Services and the government. The reason for this request is that Mr. Llacuna believes this class will help advance his professional skillset and encourage career opportunities in the future.

Pretrial Services, through Officer Dominique Jackson, and the government, through AUSA Nathan Rehn, have informed me that they each have no objection to this request. Furthermore, in April 2025, Mr. Llacuna was granted permission to travel to/from Las Vegas for a brief trip and did so without incident.

Thank you for the Court's consideration.

Respectfully submitted,

The travel request is GRANTED.
SO ORDERED.


SARAH NETBURN
United States Magistrate Judge

DATED: July 31, 2025
New York, New York